

EXHIBIT B

**EXPERT REPORT of TOM MANNING
REGARDING
SOUTHERN OREGON UNIVERSITY BUILDINGS**

My name is Tom Manning and I am employed by Construction Inspectors, Inc. ("CI"). CI was retained by Dies & Hile, LLP to inspect various buildings, take bulk samples of surfacing materials, quantify or assist in quantifying those materials identified as having been manufactured by W. R. Grace & Co. ("Grace"). I am an accredited Asbestos Building Inspector, in accordance with the requirements of the U.S. Environmental Protection Agency (EPA), Asbestos Hazard Emergency Response Act (AHERA). I have inspected hundreds of buildings during the past 5 years for the purpose of determining whether they contain or contained asbestos containing surface treatment materials (ACSTM), for collecting bulk samples of suspect materials, quantifying the amount of the ACSTM and to assess the condition of the ACSTM utilizing the guidelines contained in AHERA.

I may testify regarding the location of the Grace ACSTM in buildings owned by Southern Oregon University (SOU), my inspections of SOU's buildings, the friability of the ACSTM, the condition of the Grace ACSTM in SOU's buildings, the assessment of the hazards of the Grace ACSTM, the response actions taken regarding the Grace ACSTM, and the basis for removing the Grace ACSTM.

In November 2002 I inspected and took bulk samples of the ACSTM in Churchill Hall, the Education/Psychology building, and the Music Building. The bulk samples of spray-applied acoustical plaster and fireproofing were then sent to Material Analytical Services, (MAS) for analysis. MAS has reported that the acoustical plaster in Churchill Hall is Zonolite Acoustical Plastic, and the fireproofing in the Education/Psychology building and the Music Hall is Monokote-3 fireproofing manufactured by Grace.

Prior to conducting my inspection and bulk sampling of these materials CI was provided a copy of the *Prioritization Asbestos Assessment Study* of Churchill Hall, Education/Psychology building and the Music Hall. This study was prepared by Professional Service Industries, Inc., Hall-Kimbrell Division (PSI) in 1991 and included all buildings owned by SOU. PSI inspected the SOU buildings, took bulk samples of all material suspected to contain asbestos, quantified all materials that were found to contain asbestos, assessed the condition of the materials, and recommended appropriate response actions to be taken regarding the materials. A written report was then submitted for each building, including Churchill Hall, the Education/Psychology building and the Music building. The study included a description of the building, the locations of all asbestos-containing materials (ACM), the condition of the ACM, the potential for disturbance, drawings showing the location of the ACM, photographs of the ACM and areas of special concern.

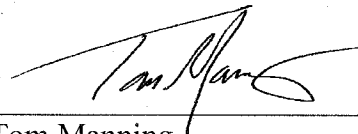
The following is a brief description of the location of the Grace ACSTM, its condition, and hazard assessment based upon my review of the PSI study and my inspection of the buildings:

a) Churchill Hall The acoustical ceiling plaster in the second floor hallway is friable and has been damaged by water leaks and physical impact. There are gouge marks and areas where the material has been scraped or raked off the ceiling. The acoustical plaster has been painted. Based on my inspection of the building the material is assessed as damaged friable surfacing ACM.

b) Education Psychology Building The fireproofing in this building was applied to structural steel beams and corrugated metal decking in the east and west wings of the top floor. The fireproofing was located above a suspended ceiling, and this space serves as an air plenum for the building. The fireproofing was in poor condition, and there was significant overspray on pipes, the electrical conduit and HVAC ducts. The material was damaged, and pieces of the fireproofing had delaminated and come loose from the beams and deck. Fireproofing debris was scattered on top of the ceilings. SOU removed the fireproofing during the summer and fall of 2003. Based on my inspection of the building the material is assessed as damaged friable surfacing ACM.

c) Music Building. The fireproofing in the Penthouse mechanical room was applied to the structural steel beams and corrugated metal deck. The material was friable. It was exposed and located in an area that was routinely accessed by maintenance and custodial workers. The fireproofing had deteriorated and delaminated from the beams and deck, and debris was falling onto the floor and surrounding equipment. The fireproofing was also contaminating other portions of the building since the mechanical room was part of the air plenum. The fireproofing was removed in November 2006. Based on my inspection of the building the material is assessed as damaged friable surfacing ACM.

Signed this 15th day of January, 2007.



Tom Manning
Texas Department of Health
Asbestos Inspectors License
No. 602286